

### **REMARKS**

This is a full and timely response to the final Office Action of September 28, 2004. Upon entry of this Second Response, claims 1-51 remain pending in this application. Reexamination, reconsideration, and allowance of the application and all presently pending claims are respectfully requested.

### **Response to §103 Rejections**

In order for a claim to be properly rejected under 35 U.S.C. §103, the combined teachings of the prior art references must suggest all features of the claimed invention to one of ordinary skill in the art. See, *e.g.*, *In Re Dow Chemical*, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988), and *In re Keller*, 208 U.S.P.Q. 871, 881 (C.C.P.A. 1981). In addition, “(t)he PTO has the burden under section 103 to establish a *prima facie* case of obviousness. It can satisfy this burden only by showing some objective teaching in the prior art or that knowledge generally available to one of ordinary skill in the art would lead that individual to combine the relevant teachings of the references.” *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988) (Citations omitted). Furthermore, the Federal Circuit has stated that “(i)t is impermissible, however, to simply engage in hindsight reconstruction of the claimed invention, using the applicant’s structure as a template and selecting elements from references to fill the gaps.” *In re Gorman*, 933 F.2d 982, 987, 18 U.S.P.Q.2d 1885 (1991).

### Claim 1

Claim 1 presently stands rejected under 35 U.S.C. §103 as purportedly unpatentable over *Watanabe* (U.S. Patent No. 6,344,907) in view of *Swanson* (U.S. Patent No. 5,603,034).

Applicant respectfully asserts that the alleged combination of *Watanabe* and *Swanson* is improper. Accordingly, the 35 U.S.C. §103 rejection of claim 1 should be withdrawn.

In particular, it is alleged in the Office Action that *Watanabe* teaches:

“an image manager configured to render a first set of said graphical data based on a first setting of an editing parameter (*Watanabe*, CPU 20, and figure 8, image AT), said image manager configured to render a second set of said graphical data defining a second image based on a second setting of said editing parameter in response to a user input and to render a third set of said graphical data based on a third setting of said editing parameter in response to said user input, thereby enabling a user to comprehend, by visually comparing said second and third images, an effect of updating said editing parameter for said first image (*Watanabe*, column 10, lines 4-56).”

However, it is candidly admitted in the Office Action that *Watanabe* fails to suggest the “editing parameter” as constituting a “pixel color parameter,” as recited by claim 1. It is then alleged in the Office Action that *Swanson* teaches:

“that the modification of color in a graphical object is well known in the art (*Swanson*, column 17, lines 12-64). It would have been obvious to a person of ordinary skill in the art at the time the invention was made, in view of the teaching of *Swanson*, to configure *Watanabe*’s system as claimed by implementing a color editing for the graphical objects because the color edition provides different visual versions of the objects for the user to select the desired one.”

Applicant respectfully submits that the alleged motivation for combining *Watanabe* and *Swanson* is insufficient to establish a *prima facie* case of obviousness.

In this regard, it is improper to allege that it is obvious to combine elements of the cited art simply because one of the elements is “well known in the art,” as alleged in the Office Action with respect to “the modification of color in a graphical object.” Indeed, the Federal

Circuit has specifically held that “(v)irtually all inventions are ‘combinations’, and... *every* invention is formed of ‘old elements’... Only God works from nothing. Man must work with old elements.” *In re Wright*, 848 F.2d 1216, 6 U.S.P.Q.2d 1959, 1962 (1988), *overruled* (on other grounds), 191 F.2d 688, *citing* H.T. Markey, *Why Not the Statute?*, 65 J. Pat. Off. Soc’y 331, 33-34 (1983). In applying similar reasoning in another case, the Federal Circuit stated:

“Humans must work with old elements, most if not all of which will normally be found somewhere in an ‘examination of the prior art’... That features, even distinguishing features, are ‘disclosed’ in the prior art is alone insufficient. As above indicated, it is common to find elements or features somewhere in the prior art. Moreover, most if not all elements perform their ordained and expected function. The test is whether the claimed invention as a whole, in light of all of the teachings of the references in their entireties, would have been obvious to one of ordinary skill in the art at the time the invention was made.” *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 1549, 220 U.S.P.Q. 193 (1983).

Moreover, to establish a *prima facie* case obviousness for claim 1, it is incumbent on the Patent Office to establish that the *cited art* provides a reason or motivation for combining the alleged teachings of *Swanson* with the alleged teachings of *Watanabe*. “Obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching or suggestion supporting the combination. Under section 103, teachings of references can be combined *only* if there is some suggestion or incentive to do so.” *ACS Hospital Systems, Inc. v. Montefiore Hospital*, 732 F.2d 1572, 1577; 221 U.S.P.Q. 929, 933 (Fed. Cir. 1984).

Applicant observes that the Office Action fails to provide any reference to a specific teaching *in the cited art* that establishes a motivation for using the “modification of color in a graphical object” as allegedly taught by *Swanson* within the “image modification apparatus” of *Watanabe*. In particular, the Office Action does provide a cite to *Swanson* (*i.e.*, column 17, lines 12-64) in an apparent attempt to justify the combination of *Swanson* with *Watanabe*.

However, such a cite allegedly establishes that “modification of color in a graphical object” is well known in the art and, for at least the reasons set forth above, is insufficient for establishing a proper motivation for combining *Swanson* and *Watanabe*. Further, there is no other cite to any specific teaching that could establish, as required by *ACS Hospital Systems*, a sufficient reason or motivation for combining the alleged teachings of *Swanson* with the alleged teachings of *Watanabe*. “Our case law makes clear that the best defense against the subtle but powerful attraction of a hindsight-based obviousness analysis is rigorous application of the requirement for a showing of the teaching or motivation to combine prior art references.” *In re Dembiczak*, 175 F.3d 994, 50 U.S.P.Q.2d 1614, 1617 (Fed. Cir. 1999). Moreover, Applicant respectfully asserts that the alleged combination of *Swanson* and *Watanabe* is not properly based on the teachings of the cited art but is instead based on improper hindsight reconstruction of Applicant’s invention.

For at least the above reasons, Applicant respectfully asserts that the combination of *Watanabe* and *Swanson* to reject the present invention, as defined by claim 1, is improper. Accordingly, the 35 U.S.C. §103 rejection of claim 1 should be withdrawn.

#### **Claims 2-9 and 33-42**

Claims 2-9 and 33-42 presently stand rejected in the Office Action under 35 U.S.C. §103 as allegedly unpatentable over *Watanabe* in view of *Swanson*. Further, claims 33-42 have been newly added via the amendments set forth herein. Applicant submits that the pending dependent claims 2-9 and 33-42 contain all features of their respective independent claim 1. Since claim 1 should be allowed, as argued hereinabove, pending dependent claims 2-9 and 33-42 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988). Furthermore, these dependent claims recite patentably distinct features

and/or combinations of features that make them allowable, notwithstanding the allowability of their base claim 1.

For example, claim 6 reads as follows:

6. The system of claim 1, wherein said image manager is further configured to render, in response to said user input, a positioning indicator movable along a path, ***said second setting corresponding to a location along said path and said third setting corresponding to another location along said path, wherein a position of said second image corresponds to said second setting location, and wherein a position of said third image corresponds to said third setting location.*** (Emphasis added).

It is admitted in the Office Action that *Watanabe* fails to suggest the features of pending claim

6. However, it is further alleged in the Office Action that:

“Swanson teaches that the modification of color in a graphical object by a positioning indicator movable along a path is well known in the art (Swanson, column 17, lines 31-38). It would have been obvious to a person of ordinary skill in the art at the time the invention was made, in view of the teaching of Swanson, to configure Watanabe’s system as claimed by implementing a color editing by a positioning indicator movable along a path for the graphical objects because the color edition such the slider bars provides an user interactive device to modify different visual versions of the objects for the user to select the desired one.”

*Swanson* does appear to suggest the use of a movable “positioning indicator.” However, there is nothing in *Swanson* to suggest that the alleged “second image,” which is allegedly based on a “second setting” of an “editing parameter,” should have a position that corresponds to a “second setting location,” which is a location along the path of the “positioning indicator corresponding to the “second setting.” In fact, *Swanson* does not appear to suggest any type of relationship between locations of the “positioning indicator” path and the ***position*** of any graphical image that is based on one of the alleged “settings.” Further, *Watanabe*, as admitted in the Office Action, does not even suggest the use of a movable “positioning indicator” at all. Thus, *Watanabe* and *Swanson*, alone or in combination, fail to suggest at least the features of claim 6

highlighted hereinabove. Accordingly, Applicant respectfully submits that the 35 U.S.C. §103 of claim 6 is improper and should be withdrawn, notwithstanding the allowability of claim 1.

In addition, claim 7 reads as follows:

7. The system of claim 1, wherein said image manager is further configured to render, in response to said user input, a positioning indicator movable along a path, said path having a first end and a second end, ***wherein said image manager is configured to position said second image adjacent to said first end, and wherein said image manager is further configured to position said third image adjacent to said second end.*** (Emphasis added).

It is candidly admitted in the Office Action that neither *Watanabe* nor *Swanson* teaches the features of pending claim 7. However, it is further alleged in the Office Action that the features of claim 7 “would have been obvious because the setting values of modifications (e.g., figure 9) in *Swanson* is inputted by sliding along a path having two ends whose indicators go along with the modifications in an arbitrary manner to provide different visual versions for user to select.” However, “(t)he mere fact that the prior art may be modified in the manner suggested by the Examiner does not make the modification obvious unless the ***prior art*** suggested the desirability of the modification.” *In re Fritch*, 972 F.2d 1260, 1266; 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992) (emphasis added). Applicant respectfully asserts that neither *Watanabe* nor *Swanson* provides a reason or motivation for positioning the alleged “second image” and “third image” adjacent to the “first end” and “second end,” respectively, of the path of the alleged “positioning indicator.”

In particular, *Swanson* depicts a movable “positioning indicator” but fails to suggest any reason or motivation for positioning a graphical image adjacent to either end of the path of the “positioning indicator.” Further, *Watanabe* fails to suggest the use of any kind of movable “positioning indicator,” as recited by claim 7. Moreover, the modification alleged in the Office Action is not properly suggested by the cited art but is instead based on improper hindsight reconstruction of Applicant’s invention, as defined by claim 7. Accordingly, Applicant

respectfully submits that the Office Action fails to establish a *prima facie* case of obviousness with respect to claim 7, and the 35 U.S.C. §103 of this claim should, therefore, be withdrawn, notwithstanding the allowability of claim 1.

Furthermore, claim 33 recites “wherein said image manager is further configured to render a movable positioning indicator and to determine said new setting based on a location of said positioning indicator.” Applicant respectfully asserts that the cited art fails to suggest the foregoing features of claim 33. In this regard, it is asserted in the Office Action that:

“Claim 33 adds into claim 1 said image manager is further configured to render a movable positioning indicator and to determine said new setting based on a location of said positioning indicator and to determine said new setting based on a location of said positioning indicator which Watanabe does not explicitly teach. However, Swanson teaches that the modification of color in a graphical object by a positioning indicator to determine the settings is well known in the art (Swanson, column 17, lines 31-38). It would have been obvious to a person of ordinary skill in the art at the time the invention was made, in view of the teaching of Swanson, to configure Watanabe’s system as claimed by implementing a color editing by a positioning indicator movable along a path to determine the setting values for the graphical objects because the color edition such the slide bars provides an user interactive device to modify different visual versions of the objects for the user to select the desired one.”

For reasons similar to those set forth hereinabove in the arguments for allowance of claim 1, simply alleging that an element is well known in the art is insufficient for establishing that it would have been obvious to combine the allegedly well known element with other elements of the cited art. Thus, in the instant case, it is incumbent upon the Patent Office to establish that the cited art, when properly viewed as a whole, provides a reason or motivation for using the alleged “positioning indicator” of *Swanson* within the image modification apparatus of *Watanabe*. Applicant respectfully asserts that the Office Action fails to sufficiently establish such a reason or motivation and, therefore, fails to establish a *prima facie* case of obviousness with respect to claim 33.

In this regard, Applicant observes that the “icons” taught by *Watanabe* appear to achieve the alleged functionality of the “positioning indicators” taught by *Swanson*. In particular, the “icons” taught by *Watanabe* appear to provide “an user interactive device to modify different visual versions of the objects for the user to select the desired one.” Thus, even if *Watanabe* is modified as alleged in the Office Action such that the modified “editing parameter” of *Watanabe* is a “pixel color parameter,” the Office Action fails to establish that the cited art, when properly viewed as a whole, provides a sufficient reason or motivation for using the “positioning indicators” taught by *Swanson* in lieu of the “icons” taught by *Watanabe* to control the settings of a “pixel color parameter.” Moreover, Applicant respectfully submits that the rejection of claim 33 is not gleaned from the cited art but is instead based on improper hindsight reconstruction of Applicant’s invention. For at least the above reasons, Applicant respectfully asserts that the 35 U.S.C. §103 of claim 33 is improper and should be withdrawn, notwithstanding the allowability of claim 1.

Additionally, claim 34 reads as follows:

34. The system of claim 33, wherein said image manager is configured to determine said new setting ***in response to a movement of said positioning indicator closer to said second image such that said new setting, as compared to said first setting, is closer to said second setting.*** (Emphasis added).

Applicant respectfully asserts that the cited art fails to provide a reason or motivation for positioning the alleged “second image” such that when the alleged “positioning indicator” is moved “closer to said second image,” the “new setting, as compared to said first setting, is closer to said second setting.” Thus, the cited art fails to suggest at least the features of claim 34 highlighted above, and the 35 U.S.C. §103 of claim 34 should be withdrawn, notwithstanding the allowability of claim 1.



Claim 41 recites “wherein said image manager determines said new setting based on a slide bar rendered by said image manager.” For at least reasons similar to those set forth hereinabove in the arguments for allowance 33, Applicant respectfully asserts that the cited art fails to provide a reason or motivation for using the alleged “slide bar” of *Swanson* in lieu of the “icons” of *Watanabe*. Accordingly, the Office Action fails to establish a *prima facie* case of obviousness with respect to claim 41, and the 35 U.S.C. §103 rejection of claim 41 should be withdrawn, notwithstanding the allowability of claim 1.

#### **Claim 10**

Claim 10 presently stands rejected under 35 U.S.C. §103 as purportedly unpatentable over *Watanabe* in view of *Swanson*. For at least the reasons set forth hereinabove in the arguments for allowance of claim 1, Applicant respectfully asserts that the combination of *Watanabe* and *Swanson* is improper. Accordingly, the 35 U.S.C. §103 rejection of claim 10 should be withdrawn.

#### **Claims 11-17 and 43-45**

Claims 11-17 and 43-45 presently stand rejected in the Office Action under 35 U.S.C. §103 as allegedly unpatentable over *Watanabe* in view of *Swanson*. Applicant submits that the pending dependent claims 11-17 and 43-45 contain all features of their respective independent claim 10. Since claim 10 should be allowed, as argued hereinabove, pending dependent claims 11-17 and 43-45 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988). Furthermore, these dependent claims recite patentably distinct features and/or combinations of features that make them allowable, notwithstanding the allowability of their base claim 1.

For example, claim 14 presently reads as follows:

14. The system of claim 10, wherein said second graphical window further includes a positioning indicator movable along a path, ***said second setting corresponding to a location along said path and said third setting corresponding to another location along said path, wherein a position of said second image corresponds to said second setting location, and wherein a position of said third image corresponds to said third setting location.*** (Emphasis added).

For at least reasons similar to those set forth hereinabove in the arguments for allowance of claims 6 and 33, Applicant respectfully asserts that the cited art fails to suggest at least the features of claim 14 highlighted above. Accordingly, the 35 U.S.C. §103 rejection of claim 14 should be withdrawn, notwithstanding the allowability of claim 10.

In addition, claim 15 presently reads as follows:

15. The system of claim 10, wherein said second graphical window includes ***a positioning indicator*** movable along a path, said path having a first end and a second end, ***wherein said second image is positioned adjacent to said first end, and wherein said third image is positioned adjacent to said second end.*** (Emphasis added).

For at least reasons similar to those set forth hereinabove in the arguments for allowance of claims 7 and 33, Applicant respectfully asserts that the cited art fails to suggest at least the features of claim 15 highlighted above. Accordingly, the 35 U.S.C. §103 rejection of claim 15 should be withdrawn, notwithstanding the allowability of claim 10.

Furthermore, claim 43 presently reads as follows:

43. The system of claim 10, wherein said image manager is configured to render ***a movable positioning indicator*** within said second graphical window and to update said editing parameter for said first image ***based on a proximity of said positioning indicator relative to said second image.*** (Emphasis added).

For at least reasons similar to those set forth hereinabove in the arguments for allowance of claims 6 and 33, Applicant respectfully asserts that the cited art fails to suggest at least the

features of claim 43 highlighted above. Accordingly, the 35 U.S.C. §103 rejection of claim 43 should be withdrawn, notwithstanding the allowability of claim 10.

Also, claim 44 recites “wherein said image manager is configured to render a slide bar in said second graphical window.” For at least reasons similar to those set forth hereinabove in the arguments for allowance of claims 6, 33, and 41, Applicant respectfully asserts that the cited art fails to suggest at least the foregoing features of claim 44. Accordingly, the 35 U.S.C. §103 rejection of claim 44 should be withdrawn, notwithstanding the allowability of claim 10.

### **Claim 18**

Claim 18 presently stands rejected under 35 U.S.C. §103 as purportedly unpatentable over *Watanabe* in view of *Swanson*. For at least the reasons set forth hereinabove in the arguments for allowance of claim 1, Applicant respectfully asserts that the combination of *Watanabe* and *Swanson* is improper. Accordingly, the 35 U.S.C. §103 rejection of claim 18 should be withdrawn.

### **Claims 19-25 and 46**

Claims 19-25 and 46 presently stand rejected in the Office Action under 35 U.S.C. §103 as allegedly unpatentable over *Watanabe* in view of *Swanson*. Applicant submits that the pending dependent claims 19-25 and 46 contain all features of their respective independent claim 18. Since claim 18 should be allowed, as argued hereinabove, pending dependent claims 19-25 and 46 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988). Furthermore, these dependent claims recite patentably distinct features and/or combinations of features that make them allowable, notwithstanding the allowability of their base claim 18.

For example, claim 22 presently reads as follows:

22. The method of claim 18, further comprising the steps of:  
rendering, in response to said user input, ***a positioning indicator  
movable along a path, wherein said second setting corresponds to a first  
location along said path, and wherein said third setting corresponds to a  
second location along said path;***  
sliding said positioning indicator along said path;  
***positioning said second image at a location corresponding to said first  
location; and***  
***positioning said third image at a location corresponding to said second  
location.*** (Emphasis added).

For at least reasons similar to those set forth hereinabove in the arguments for allowance of claims 6 and 33, Applicant respectfully asserts that the cited art fails to suggest at least the features of claim 22 highlighted above. Accordingly, the 35 U.S.C. §103 rejection of claim 22 should be withdrawn, notwithstanding the allowability of claim 18.

In addition, claim 23 presently reads as follows:

23. The method of claim 18, further comprising the steps of:  
rendering, in response to said user input, ***a positioning indicator  
movable along a path***, said path having a first end and a second end;  
sliding said positioning indicator along said path;  
***positioning said second image adjacent to said first end; and***  
***positioning said third image adjacent to said second end.*** (Emphasis added).

For at least reasons similar to those set forth hereinabove in the arguments for allowance of claims 7 and 33, Applicant respectfully asserts that the cited art fails to suggest at least the features of claim 23 highlighted above. Accordingly, the 35 U.S.C. §103 rejection of claim 23 should be withdrawn, notwithstanding the allowability of claim 18.

### **Claim 26**

Claim 26 presently stands rejected under 35 U.S.C. §103 as purportedly unpatentable over *Watanabe* in view of *Swanson*. For at least the reasons set forth hereinabove in the arguments for allowance of claim 1, Applicant respectfully asserts that the combination of *Watanabe* and *Swanson* is improper. Accordingly, the 35 U.S.C. §103 rejection of claim 18 should be withdrawn.

### **Claims 27-32**

Claims 27-32 presently stand rejected in the Office Action under 35 U.S.C. §103 as allegedly unpatentable over *Watanabe* in view of *Swanson*. Applicant submits that the pending dependent claims 27-32 contain all features of their respective independent claim 26. Since claim 26 should be allowed, as argued hereinabove, pending dependent claims 27-32 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988). Furthermore, these dependent claims recite patentably distinct features and/or combinations of features that make them allowable, notwithstanding the allowability of their base claim 18.

For example, claim 29 presently reads as follows:

29. The method of claim 26, further comprising the steps of:  
***rendering a positioning indicator movable along a path, wherein said second setting corresponds to a first location along said path, and wherein said third setting corresponds to a second location along said path;***  
***positioning said second image at a location corresponding to said first location; and***  
***positioning said third image at a location corresponding to said second location.*** (Emphasis added).

For at least reasons similar to those set forth hereinabove in the arguments for allowance of claims 6 and 33, Applicant respectfully asserts that the cited art fails to suggest at least the

features of claim 29 highlighted above. Accordingly, the 35 U.S.C. §103 rejection of claim 29 should be withdrawn, notwithstanding the allowability of claim 26.

In addition, claim 30 presently reads as follows:

30. The method of claim 26, wherein said graphical window further includes ***a positioning indicator movable along a path***, said path having a first end and a second end, and wherein said method further comprises the steps of: ***positioning said second image adjacent to said first end; and positioning said third image adjacent to said second end.*** (Emphasis added).

For at least reasons similar to those set forth hereinabove in the arguments for allowance of claims 7 and 33, Applicant respectfully asserts that the cited art fails to suggest at least the features of claim 30 highlighted above. Accordingly, the 35 U.S.C. §103 rejection of claim 30 should be withdrawn, notwithstanding the allowability of claim 26.

#### **Claim 47**

Claim 47 presently stands rejected under 35 U.S.C. §103 as purportedly unpatentable over *Watanabe* in view of *Swanson*. For at least the reasons set forth hereinabove in the arguments for allowance of claim 1, Applicant respectfully asserts that the combination of *Watanabe* and *Swanson* is improper. Accordingly, the 35 U.S.C. §103 rejection of claim 47 should be withdrawn.

#### **Claims 48-51**

Claims 48-51 presently stand rejected in the Office Action under 35 U.S.C. §103 as allegedly unpatentable over *Watanabe* in view of *Swanson*. Applicant submits that the pending dependent claims 48-51 contain all features of their respective independent claim 47. Since claim 47 should be allowed, as argued hereinabove, pending dependent claims 48-51 should be

allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988). Furthermore, these dependent claims recite patentably distinct features and/or combinations of features that make them allowable, notwithstanding the allowability of their base claim 18.

For example, claim 49 presently reads as follows:

49. The system of claim 48, wherein said image manager is configured to ***render a movable positioning indicator*** within said second graphical window and to update said editing parameter for said first image based on a location of said positioning indicator. (Emphasis added).

For at least reasons similar to those set forth hereinabove in the arguments for allowance of claim 33, Applicant respectfully asserts that the cited art fails to suggest at least the features of claim 49 highlighted above. Accordingly, the 35 U.S.C. §103 rejection of claim 49 should be withdrawn, notwithstanding the allowability of claim 47.


**CONCLUSION**

Applicant respectfully requests that all outstanding objections and rejections be withdrawn and that this application and all presently pending claims be allowed to issue. If the Examiner has any questions or comments regarding Applicant's response, the Examiner is encouraged to telephone Applicant's undersigned counsel.

Respectfully submitted,

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& RISLEY, L.L.P.**

By:

A handwritten signature in black ink, appearing to read "Jon E. Holland", written over a horizontal line.

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